

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

FILED
U.S. DISTRICT COURT
INDIANAPOLIS DIVISION

2013 JAN -7 AM 9:33

UNITED STATES OF AMERICA,

Plaintiff,

v.

CONNIE S. SAYNE,

Defendant.

) Cause No. 1:13 -cr-

1 : 13 -cr- 0001 WTL -DML

INFORMATION

The United States Attorney charges that:

General Allegations

At all times relevant to this Information:

A. UAW Local 3050:

1. United Auto Workers Local 3050 ("UAW Local 3050"), was a labor union that represents employees of Autocar, LLC, in Hagerstown, Indiana, in the Southern District of Indiana.
2. Autocar, LLC is engaged in interstate commerce, as it manufactures trucks that are sold throughout the United States and globally.
3. Autocar, LLC has bargained collectively with Local 3050 since November 17, 2003.

B. Connie S. Sayne:

4. CONNIE S. SAYNE was a resident of Connersville, Indiana, in the Southern District of Indiana, and was the Financial Secretary of UAW Local 3050 for fiscal years 2009 through 2011. Article VII, Section 1 of UAW Local 3050's bylaws describes the Financial Secretary as an officer of the union.

5. From approximately June 12, 2009 through May 16, 2012, CONNIE S. SAYNE, as UAW Local 3050 Financial Secretary, was a signatory on UAW Local 3050's checking account at West End Bank.

6. Article 40, Section 5 of the UAW Constitution states that the Financial Secretary "shall write all checks drawn on" a local union's treasury. Sections 1 and 11 of that same article require that all checks be co-signed by a local union's president and treasurer. UAW Local 3050 has combined the officers of financial secretary and treasurer pursuant to Section 9.

COUNT 1

Embezzlement and Theft of Labor Union Assets
(29 U.S.C. §501(c))

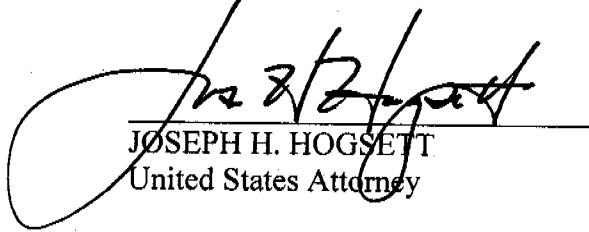
Beginning in June 2010 and continuing until April 2012, in the Southern District of Indiana,

CONNIE S. SAYNE

defendant herein, while an officer, that is, Financial Secretary, of UAW Local 3050, a labor organization engaged in an industry affecting commerce, did embezzle, steal and unlawfully and willfully abstract and convert to her own use the moneys, funds, securities, property, and other assets of said labor organization in the approximate amount of \$25,699.53, by forging the signatures of current and predecessor UAW Local 3050 presidents during the relevant time

period on approximately 64 unauthorized checks made payable to CONNIE S. SAYNE, which checks CONNIE S. SAYNE negotiated for her personal use and benefit.

All of which is in violation of Title 29, United States Code, Section 501(c).


JOSEPH H. HOGSETT
United States Attorney

STATE OF INDIANA)
COUNTY OF MARION) SS:

MaryAnn T. Mindrum, being first duly sworn, upon her oath deposes and says that she is an Assistant United States Attorney in and for the Southern District of Indiana, that she makes this affidavit for and on behalf of the United States of America and that the allegations in the foregoing Information are true as she is informed and verily believes.


MaryAnn T. Mindrum
Assistant United States Attorney

Subscribed and sworn to before me, a notary public, on this 4th day of January, 2013.

Michelle A. Butler
Michelle A. Butler
Notary Public

My Commission Expires:

January 21, 2016

My County of Residence:

Hendricks

